

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO



UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Case No.: <u>MJ 21-1365 SCY</u>
)	
vs.)	Count 1: 18 U.S.C. § 13(a), NMSA
)	§ 30-15-1: Criminal Damage to
DOMINIC T. THOMAS,)	Property (Class B Misdemeanor);
)	
Defendant.)	Count 2: 36 C.F.R. § 1.5(f):
)	Closures and Public Use Limits
)	(Infraction);
)	
)	Count 3: 36 C.F.R. § 2.13 (a)(3):
)	Fires (Infraction).

INFORMATION

The United States Attorney charges:

Count 1

On or about September 11, 2021, within the boundaries of the Petroglyph National Monument, in Bernalillo County, in the District of New Mexico, and within the concurrent jurisdiction of the United States and administered by the National Park Service, the defendant, **DOMINIC T. THOMAS**, without consent of the owner, intentionally damaged real and personal property belonging to another by setting fire to grass, brush, and fencing situated on the property of the Petroglyph National Monument.

In violation of 18 U.S.C. § 13(a) and NMSA § 30-15-1.

Count 2

On or about September 11, 2021, within the boundaries of the Petroglyph National Monument, in Bernalillo County, in the District of New Mexico, and within the concurrent jurisdiction of the United States and administered by the National Park Service, the defendant, **DOMINIC T. THOMAS**, was walking and sitting on top of the JA Volcano, an area designated

closed to the public by the Superintendent of Petroglyph National Monument.

In violation of 36 C.F.R. § 1.5(f).

Count 3

On or about September 11, 2021, within the boundaries of the Petroglyph National Monument, in Bernalillo County, in the District of New Mexico, and within the concurrent jurisdiction of the United States and administered by the National Park Service, the defendant, **DOMINIC T. THOMAS**, lit and set fire in a manner that threatens, caused damage and resulted in the burning of property, park resources and created a public safety hazard.

In violation of 36 C.F.R. § 2.13 (a)(3).

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